

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

## **William C. Miller, Esq.**

**NOTICE OF FORBEARANCE AGREEMENT PURSUANT TO A COVID-19  
HARDSHIP**

COMES NOW, Manley Deas Kochalski LLC, on behalf of Secured Creditor, PNC Bank, National Association and files this Notice of Forbearance Agreement Pursuant to a COVID-19 Hardship (the "Notice") with the Court regarding Debtor's request for payment forbearance based upon a material financial hardship caused by the COVID-19 pandemic, and in support of same, states as follows:

1. Debtor(s) requested a forbearance agreement related to a COVID-19 hardship with respect to Debtor's property located at 1173 South Evergreen Drive, Phoenixville, PA 19460.
2. Secured Creditor agreed to a payment forbearance for a period of 3 months starting with the month of October 1, 2021 and ending with the month of December 1, 2021 (the "Forbearance Period").

3. By this Notice, Secured Creditor is requesting that Debtor's (Debtors') counsel take whatever steps are necessary, if any, to formalize this agreement with the Bankruptcy Court, such as an Amended Plan, Request for Loss Mitigation or Notice of Loan Modification if same is required.

4. Secured Creditor does not waive its rights to seek relief from the automatic stay for reasons other than non-payment during the Forbearance Period, including, but not limited to, a lapse in insurance coverage or non-payment of property taxes.

5. Secured Creditor does not waive any rights to collect the payments that come due during the forbearance period after the forbearance plan ends, subject to the rules of the Bankruptcy Code.

6. Secured Creditor does not waive its rights under other applicable non-bankruptcy laws and regulations, including, but not limited to, RESPA, and the right to collect any post-petition escrow shortage, subject to the rules of the Bankruptcy Code.

7. Furthermore, during the forbearance period Secured Creditor may continue to file notices in compliance with Fed. Rule Bankr. P. 3002.1.

Respectfully submitted,

/s/ Alyk L. Oflazian

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Adam B. Hall, Esquire (323867)  
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Columbus, OH 43216-5028  
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Attorneys for Creditor  
The case attorney for this file is Adam B. Hall.  
Contact email is abh@manleydeas.com

Counsel for Secured Creditor, PNC Bank,  
National Association

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing Notice of Forbearance  
Agreement Pursuant to a COVID-19 Hardship was served on the parties listed below via e-mail  
notification:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

William C. Miller, Esq., Chapter 13 Trustee, Office of the Chapter 13 Standing Trustee, P.O. Box 40837, Philadelphia, PA 19107, [ecfemails@ph13trustee.com](mailto:ecfemails@ph13trustee.com)

Timothy Wilfong, Attorney for Barbara Jean Sims AKA Barbara J Taney Sims, AKA Barbara J Sims, Law Office of Timothy E Wilfong LLC, 20 South Main Street, Phoenixville, PA 19460, [timwilfong@aol.com](mailto:timwilfong@aol.com)

The below listed parties were served via regular U.S. Mail, postage prepaid, on September 28, 2021:

Barbara Jean Sims AKA Barbara J Taney Sims, AKA Barbara J Sims, 1173 S. Evergreen Dr., Phoenixville, PA 19460

Oliver Sims, 1173 South Evergreen Drive, Phoenixville, PA 19460

DATE: 9/28/2021

/s/ Alyk L. Oflazian

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